

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of)

Information associated with Three Target)
Accounts/Identifiers, for Investigation of 21)
U.S.C. §§ 841 and 846 and Other Offenses)

Case No. MJ20-339

APPLICATION FOR A SEARCH WARRANT AND PEN-TRAP ORDER

I, a federal law enforcement officer or an attorney for the government, request a search warrant and pen-trap order, and state under penalty of perjury that I have reason to believe that on the person or property described in Attachment A, located in the Western District of Washington, there is now concealed property and evidence described in Attachment B. This Court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3)(A) and Federal Rule of Criminal Procedure 41.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 21 U.S.C. §§ 841 and 846

Offense Description
 Distribution of Controlled Substances and Conspiracy
 to Distribute Controlled Substances

The application is based on the facts set forth in the attached affidavit, which is incorporated herein by reference with all attachments and exhibits. Pursuant to 18 U.S.C. § 3123(a)(1), Exhibit 1 to the affidavit includes a certification from an attorney from the government that the requested information is relevant to an ongoing criminal investigation.

☒ Delayed notice of 90 days (give exact ending date if more than 30 days: October 24, 2020) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 41, this warrant is presented by:


☒ by reliable electronic means; or ☐ telephonically recorded


Applicant's signature

Ryan Smith, Special Agent, Drug Enforcement
 Administration
Printed name and title

- ☐ The foregoing affidavit was sworn before me and signed in my presence, or
☐ The above-named officer provided a sworn statement attesting to the truth or the foregoing affidavit by telephone/

Date: June 11, 2020


Judge's signature

Paula L. McCandlis, United States Magistrate Judge
Printed name and title

City and state: Bellingham, Washington
 USAO # 2020R00259

[illegible]

I. INTRODUCTION

a. **Target Telephone 4 (TT4)**, assigned call number (206) 880-4341, with listed subscriber “Jose Luis VALLE IBARRA” with an address of “19065 21st Ave NE, Lake Forest Park, Washington, 98155-2401,” whose service provider is T-Mobile, a wireless telephone service provider located at 4 Sylvan Way, Parsippany, New Jersey 07054. Service began for TT4 on March 30, 2020. TT4 is described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B. Investigators believe that TT4 is being used by Jose Luis IBARRA VALLE to facilitate his drug trafficking activities.

b. **Target Telephone 5 (TT5)**, assigned call number (425) 328-5534, with listed subscriber "Jesus Granica" with an address of "2118 168th Street SE, Bothell, Washington, 98012-6056," whose service provider is T-Mobile, a wireless telephone service provider located at 4 Sylvan Way, Parsippany, New Jersey 07054. Service began for **TT5** on November 3, 2019. **TT5** is described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B. Investigators believe that **TT5** is being used by Jesus GARNICA MELGOZA to facilitate drug trafficking activities.

1 6. A “pen register” is “a device or process which records or decodes dialing,
2 routing, addressing, or signaling information transmitted by an instrument or facility from
3 which a wire or electronic communication is transmitted.” 18 U.S.C. § 3127(3). A “trap
4 and trace device” is “a device or process which captures the incoming electronic or other
5 impulses which identify the originating number or other dialing, routing, addressing, and
6 signaling information reasonably likely to identify the source of a wire or electronic
7 communication.” 18 U.S.C. § 3127(4).

8 7. In the traditional telephone context, pen registers captured the destination
9 phone numbers of outgoing calls, while trap and trace devices captured the phone
10 numbers of incoming calls. Similar principles apply to other kinds of wire and electronic
11 communications such as emails, text messages, connection logs, and data transfers. The
12 prospective location data sought in this application constitutes “dialing, routing,
13 addressing, and signaling information” covered by the Pen Register Act. Accordingly,
14 the requested warrant will record, decode, and/or capture dialing, routing, addressing, and
15 signaling information associated with the Target Cell Phone without geographic limit.

16 8. The United States further requests, pursuant to 18 U.S.C. §§ 3123(b)(2) and
17 3124(a)-(b), that the Court order through Attachment B of the requested warrant that T-
18 Mobile and any other person or entity providing wire or electronic communication
19 service in the United States whose assistance may facilitate execution of this warrant
20 furnish, upon service of the warrant, information, facilities, and technical assistance
21 necessary to install the pen/trap, including installation and operation of the pen-trap
22 unobtrusively and with minimum disruption of normal service. Any entity providing
23 such assistance shall be reasonably compensated by the Drug Enforcement
24 Administration, pursuant to 18 U.S.C. § 3124(c), for reasonable expenses incurred in
25 providing facilities and assistance in furtherance of the warrant.

26 9. This is the second application in this judicial district for a search warrant
27 authorizing disclosure of the above information for Target Telephones 4 and 5 in
28 connection with this investigation. This is first application in this judicial district for a

1 search warrant authorizing disclosure of the above information for Target Telephone 6 in
2 connection with this investigation.

3 10. **Through this application, the United States does not request and does**
4 **not seek to obtain the contents of any communications, as defined in 18 U.S.C.**
5 **§ 2510(8).**

6 II. AGENT BACKGROUND

7 11. I am an “investigative or law enforcement officer of the United States”
8 within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am a
9 Special Agent with the Drug Enforcement Administration (“DEA”), assigned to the
10 Bellingham, Washington Resident Office. In that capacity, I investigate violations of the
11 Controlled Substances Act (Title 21, United States Code, Section 801, *et seq.*). I have
12 been employed as a Special Agent with the DEA since March 2017. Prior to becoming a
13 Special Agent, I was a detective in the Special Victims Unit, a police motorcycle officer,
14 and a police patrol officer with the Hoover Police Department in Hoover, Alabama. In
15 my experience as a law enforcement officer, I have participated in numerous narcotics
16 investigations, during the course of which I have participated in physical surveillance and
17 executions of search warrants.

18 12. I have completed the DEA Basic Agent Training Course as well as other
19 training courses related to gangs and narcotics trafficking. I have participated in
20 narcotics investigations at both the local and federal level, and I have participated in the
21 execution of federal search warrants. As a result, I have become familiar with methods
22 of operation of drug traffickers and organizations. As a Special Agent with the DEA, I
23 have the responsibility of working with other federal and state law enforcement officers
24 in investigations of violations of federal and state controlled substance laws, including
25 the investigation of cocaine, methylenedioxymethamphetamine (MDMA),
26 methamphetamine, heroin, fentanyl, marijuana, and other dangerous drugs.

27 13. I have interviewed numerous drug dealers, drug users, and knowledgeable
28 confidential informants about the lifestyles, appearances, and habits of drug dealers and

1 users. I have become familiar with the manner in which narcotics traffickers smuggle,
2 package, transport, store, and distribute narcotics, as well as how they collect and launder
3 drug proceeds. I am also familiar with the manner in which narcotics traffickers use
4 telephones, cellular telephone technology, internet, pagers, coded communications, slang-
5 filled conversations, false and fictitious identities, and other means to facilitate their
6 illegal activities and mislead law enforcement investigations. I have had discussions with
7 other law enforcement personnel about the packaging and preparation of narcotics, the
8 methods of illegal narcotics traffickers, and the security measures that narcotics
9 traffickers often employ. I have examined narcotics customers' supplier lists, pay/owe
10 ledgers maintained by traffickers, and other documentation related to narcotics
11 trafficking. I have also examined documentation of various methods by which
12 methamphetamine, cocaine, marijuana, heroin, and other illicit drugs are smuggled,
13 transported, and distributed. I have participated in hundreds of hours of surveillance of
14 narcotics traffickers. During surveillance, I have personally observed narcotics
15 transactions, counter surveillance techniques, and the ways in which narcotics traffickers
16 conduct clandestine meetings.

17 14. Through my participation as a case agent in Title III investigations, I have
18 gained knowledge and experience conducting investigations utilizing the interception of
19 wire and electronic communications. I have been involved with the review and decoding
20 of veiled intercepted conversations between narcotics traffickers that were subsequently
21 substantiated. Throughout my career in law enforcement, I have received training from,
22 worked with, spoken with, and gleaned knowledge from several experienced federal,
23 state, and local narcotics officers concerning the use of cell phones by drug traffickers to
24 facilitate drug trafficking activities.

25 15. The facts in this affidavit come from my personal observations, my training
26 and experience, and information obtained from other agents and witnesses. This affidavit
27 is intended to show merely that there is sufficient probable cause for the requested
28

1 warrant and pen-trap, and therefore does not set forth all of my knowledge about this
2 matter.

3 16. Based on the facts set forth in this affidavit, there is probable cause to
4 believe that violations of Title 21, United States Code, Sections 841 and 846, have been
5 committed, are being committed, and will be committed by Jose Luis IBARRA VALLE,
6 Jesus GARNICA MELGOZA, and PAISA. There is also probable cause to believe that
7 the location information described in Attachment B will constitute evidence of these
8 criminal violations, and will lead to the identification of individuals who are engaged in
9 the commission of these offenses.

10 III. PROBABLE CAUSE

11 A. The Investigation

12 17. The United States, including the Drug Enforcement Administration, is
13 conducting a criminal investigation of Jose Luis IBARRA VALLE, Jesus GARNICA
14 MELGOZA, "PAISA", and others, regarding possible violations of 21 U.S.C. 841(a)(1)
15 (distribution of controlled substances) and 846 (conspiracy to distribute controlled
16 substances).

17 1. Controlled Purchase from Jose Luis IBARRA VALLE in March 2020

18 18. In early 2020, a DEA confidential source (hereinafter "CS1") obtained,
19 from an associate in Mexico, the telephone number for an individual who would be able
20 to sell CS1 drugs. That telephone number was 503-607-9047 (IBARRA VALLE Phone
21 1). In summary, CS1 called the user of the IBARRA VALLE Phone 1, who was later
22 identified as Jose Luis IBARRA VALLE; IBARRA VALLE told CS1 that IBARRA
23 VALLE could provide CS1 a large quantity of methamphetamine. During the week of
24 March 6, 2020, CS1 arranged, via telephone, for the purchase of one pound of
25 methamphetamine.

26 19. CS1 is cooperating for financial compensation and immigration
27 consideration. CS1 has prior convictions for illegal entry after deportation, most recently
28

1 in 2012, and a prior Washington State controlled substance violation in 2002. CS1 has
2 conducted numerous controlled purchases and is considered credible and reliable.

3 20. On March 19, 2020, investigators met with CS1. CS1 made a consensually
4 recorded telephone call to IBARRA VALLE on IBARRA VALLE Phone 1 and arranged
5 to meet IBARRA VALLE in Lake Forest, Washington.¹ CS1 and CS1's vehicle were
6 searched for large amounts of US currency, weapons, and other contraband; none was
7 found. CS1 was provided a concealed recording device and \$2,700 in pre-recorded buy
8 funds.

9 21. CS1 told investigators that through prior phone calls (not recorded), he/she
10 and the user of IBARRA VALLE Phone 1, agreed on a purchase price of \$2,500 for the
11 pound of methamphetamine. The additional \$200 was paid by the CS to the individual in
12 Mexico who provided the CS IBARRA VALLE's phone number. The CS sent the \$200
13 to Mexico via Sigue, a money remitter.

14 22. Investigators followed CS1 to the arranged meeting location. CS1 did not
15 meet with anyone prior to the arrival of IBARRA VALLE. Investigators saw IBARRA
16 VALLE get into CS1's vehicle and noted that IBARRA VALLE arrived in a gray 2007
17 Nissan Altima (hereinafter "Target Vehicle 1" or "TV1"). Investigators later observed
18 that the Nissan Altima bore Washington license plate, BQY0420. According to the
19 Washington Department of Licensing, BQY0420 was the license plate number for a 2007
20 Nissan Altima registered to "ARMENDARIZ OLIVARES, SILVIA BELEM" at
21 6508 Northeast 181st Street, Kenmore, Washington 98028-4802. CS1 and IBARRA
22 VALLE met for a short amount of time in CS1's vehicle before investigators saw
23 IBARRA VALLE get out of CS1's vehicle, walk back to his Nissan (TV1), and leave the
24 area.

25
26
27 ¹ All calls between CS1 and IBARRA VALLE prior to this call were not made in the presence of law enforcement
28 and were not recorded; a review of tolls showed that CS1 had phone calls with IBARRA VALLE phone 1 prior to
March 19, 2020.

23. Investigators followed CS1 from the meeting location and again met with CS1. CS1 did not meet with anyone between IBARRA VALLE leaving CS1's vehicle and the subsequent meeting with investigators. CS1 and CS1's vehicle were searched for weapons, large quantities of US currency and other contraband; none was found. Investigators recovered the suspected methamphetamine and the recording device from CS1. The suspected methamphetamine weighed approximately 552.7 gross grams and field tested presumptive positive for the presence of methamphetamine.²

24. CS1 told investigators that CS1 met with IBARRA VALLE, IBARRA VALLE provided CS1 with the methamphetamine, CS1 paid IBARRA VALLE with the pre-recorded buy funds, and IBARRA VALLE did not count the money. CS1 stated that IBARRA VALLE also showed CS1 a small quantity of what CS1 was told, by IBARRA VALLE, was heroin.³ IBARRA VALLE also told CS1 that he had access to methamphetamine, heroin, and pills. IBARRA VALLE told CS1 that the pills were "real." Based on training and experience, investigators believe that IBARRA VALLE told CS1 that the pills were not counterfeit pills containing fentanyl but rather contained oxycodone. CS1 also stated that IBARRA VALLE told CS1 that IBARRA VALLE had recently arrived in Washington and purchased his vehicle (TV1). A Spanish speaking investigator listened to CS1's conversation with IBARRA VALLE as it was occurring. The Spanish speaking investigator confirmed CS1's recounting of the meeting with IBARRA VALLE was accurate.

25. A different investigator,⁴ who is fluent in Spanish, provided a rough translation and transcription of the recorded Spanish-language conversation, and portions

² The methamphetamine weight included a Tupperware type container with attached tape that was used to seal the container. Investigators have not received results from the lab regarding weight and composition of the suspected methamphetamine.

³ IBARRA VALLE did not use the term "heroin," but rather the coded Spanish words for "dirt/earth" and "brunette."

⁴ This is a different Spanish speaking investigator than the one who listened to conversation between CS1 and IBARRA VALLE as it occurred.

1 of that translation and transcription are included in the following paragraphs.⁵ During the
2 Spanish-language conversation between CS1 and IBARRA VALLE, they said the
3 following:

4 **CS1:** How're we doing, cousin?

5 **IBARRA VALLE:** Really good, just here.

6 **CS1:** I was never able to understand what you were telling me about you having
7 some of the other stuff

8 **IBARRA VALLE:** I have earth/dirt... the brunette (heroin), I also have some of
9 the pills

10 **CS1:** Pills and brunette?

11 **IBARRA VALLE:** Yes

12 **CS1:** It's just that I didn't want to say much because I don't really like talking on
13 the phone, so I couldn't really understand what you were trying to tell me

14 **IBARRA VALLE:** Yeah, it's ok

15 **CS1:** Yeah, but the other guys were telling me that they were going to sell me
16 kilos

17 **IBARRA VALLE:** No, I only take out pounds, old man

18 **CS1:** Just pounds?

19 **IBARRA VALLE:** Yes. What do you think?

20 **CS1:** Can I see it really quick?

21 **IBARRA VALLE:** Yes, I have it right here

22 **CS1:** Look, I have a friend. The truth is, I wasn't going to get anything today,
23 because nobody wants to work.

24 26. Based on training and experience, the Spanish-speaking investigator
25 listening to the conversation as it took place, and CS1 statements, investigators believe
26 that in the above conversation IBARRA VALLE, offered and showed heroin to CS1.

27 _____
28 ⁵ This individual provided all of the translations and transcriptions of Spanish-language communications provided in this Affidavit.

1 Investigators believe this took place when IBARRA VALLE said he had the "dirt/earth"
2 and the "brunette," which investigators know to be coded language for heroin.
3 Investigators also believe that IBARRA VALLE said he had pills and that he had pounds
4 of drugs as well.

5 27. Later in the conversation, IBARRA VALLE and CS1 continued:

6 **IBARRA VALLE:** Hey can you do me the favor of getting some brunette or no?

7 **CS1:** I think, so. Is it good?

8 **IBARRA VALLE:** Yes

9 **CS:** And what price does that have?

10 **IBARRA VALLE:** Well, 700 the piece. What do you think?

11 **CS1:** But that's...

12 **IBARRA VALLE:** It's good stuff

13 **CS1:** Well, with that thing, to know the price, one needs to see it, no? Because
14 some people put their hands on it and cut it up. And then other people put their
15 hands on it and cut it up.

16 **IBARRA VALLE:** I actually have a little bit of it here. It's good stuff. The truth,
17 it's really good, old man. We don't put anything in it. The only thing, it is a bit
18 mushed up because of the way they transport it, right?

19 **CS1:** But I...

20 **IBARRA VALLE:** I already told my brother to send it whole. To try to send it
21 whole. Because it's difficult to sell when it's mushed up like that. They refuse it.

22 **CS1:** Oh, ok. At 7?

23 **IBARRA VALLE:** Yes

24 28. The recording of the conversation showed that IBARRA VALLE and CS1
25 continued talking. Later in the conversation, they had the following exchange:

26 **CS1:** How are the pills?

27 **IBARRA VALLE:** Well those I can give them to you at wholesale at about 12

28 **CS1:** 12?

1 **IBARRA VALLE:** Yes

2 **CS1:** It's a bit expensive, no? But they're replicas, right? Because the original
3 one's are expensive.

4 **IBARRA VALLE:** No, those are originals. Really. The 30's

5 **CS1:** That's what they say

6 **IBARRA VALLE:** No, really. Yeah old man, they are the badass ones. Even a
7 guy that I sold 100 to told me, holy shit these are the real thing. That's what he
8 told me. Because there are some that aren't good, they are...

9 **CS1:** They are imitation

10 **IBARRA VALLE:** Yes. But these are good, friend. And this stuff is also badass

11 **CS1:** Yeah, you can tell it's good

12 **IBARRA VALLE:** Yeah, it's good, the truth. Do me the favor to help me move
13 this stuff let's see if there is a way. This dirt/earth.

14 **CS1:** I do have a cousin, but he's always asked me for pills but I have never
15 wanted. I have asked him.

16 **IBARRA VALLE:** I'll take them to wherever you tell me to

17 **CS1:** He was telling me that he was getting them for 9, but they were fake

18 **IBARRA VALLE:** No, these are originals old man, the truth

19 **CS1:** But they told him that they were originals

20 **IBARRA VALLE:** And if not he can give them to someone to test them, because
21 that's what I did. To the guy I sold them to, he said lets go test them. And if they
22 aren't the good ones, there will be no deal. Well I told him, let's go.

23 29. Based on training and experience, the Spanish-speaking investigator
24 listening to the conversation as it took place, and CS1 statements, investigators believe
25 that in the above conversation IBARRA VALLE told CS1 that the price per ounce, or
26 "piece," of heroin is \$700. Investigators also believe that when IBARRA VALLE told
27 CS1 that IBARRA VALLE had the real "30's." Investigators believe that IBARRA
28 VALLE is referring to Oxycodone 30 milligram pills, "M30's", and that IBARRA

1 VALLE was saying that the pills are real, as opposed to imitation or counterfeit pills
2 made with fentanyl. Investigators also believe that he could sell CS1 the pills for \$12 per
3 pill. Investigators know that the majority of M30's being sold on the illegal drug market
4 are made with fentanyl.

5 30. Later in the conversation IBARRA VALLE and CS1 continued:

6 CS1: With the pills I think I can find you a good customer

7 IBARRA VALLE: Do me the favor, I have a ton there, old man.

8 CS1: You can get lots?

9 IBARRA VALLE: I have about 10,000

10 CS1: Really?

11 IBARRA VALLE: Really

12 CS1: You have an urgency

13 IBARRA VALLE: I have lots of work but I don't have clients

14 CS1: That's bad, then

15 IBARRA VALLE: I have a shit ton of pounds, too

16 CS1: Well let things pass and I'll get some of everything

17 IBARRA VALLE: We have lots of this stuff, too

18 CS1: Let all this pass. With that other guy I was getting 10 kilos, that's 20 pounds

19 IBARRA VALLE: Yes, absolutely old man

20 CS1: That's why I want you to give me a good price

21 IBARRA VALLE: You're on, absolutely

22 31. Based on training and experience, the Spanish-speaking investigator
23 listening to the conversation as it took place, and CS1 statements, investigators believe
24 that in the above conversation IBARRA VALLE said he had 10,000 pills, several pounds
25 of drugs, but that he lacked customers

26 32. Following the meeting with CS1, investigators followed IBARRA VALLE
27 after he left the meeting location and as he drove around the area in TV1. As
28 investigators followed IBARRA VALLE, they saw him driving in a manner consistent

1 with conducting counter surveillance. Specifically, investigators observed IBARRA
 2 VALLE pull into a Park and Ride parking lot, turn around, and immediately reverse his
 3 original course of travel. Additionally, investigators observed IBARRA VALLE pull to
 4 the side of the road in Lake Forest, Washington. Shortly thereafter, investigators
 5 observed a male walk across the street and get into IBARRA VALLE's vehicle. The
 6 individual remained in IBARRA VALLE's car (TV1) for a short amount of time before
 7 investigators saw him get out and walk across the street, get into another car, and drive
 8 away. Based on training and experience, investigators believe that IBARRA VALLE
 9 conducted another drug transaction.

10 33. Investigators followed IBARRA VALLE to 19065 21st Avenue Northeast,
 11 Lake Forest Park, Washington, which, as discussed below, investigators believe to be
 12 IBARRA VALLE's residence.⁶ A short time later, investigators followed IBARRA
 13 VALLE from his suspected residence to a market in Shoreline, Washington. After
 14 IBARRA VALLE left the market, a King County Sheriff's deputy stopped the vehicle
 15 (TV1). Investigators reviewed IBARRA VALLE's Mexican voter registration card,
 16 which identified him by name, and released him.

17 2. Identification of TT4

18 34. On April 3, 2020—approximately two weeks after CS1's controlled buy
 19 with IBARRA VALLE—service for IBARRA VALLE Phone 1 ended. Investigators
 20 then identified a new phone number that they believe IBARRA VALLE uses. According
 21 to T-Mobile, on March 30, 2020, service was started on (206) 880-4341 (TT4) and is
 22 subscribed to "Jose Luis VALLE IBARRA" at "19065 21st Ave NE Lake Forest Park
 23 WA 98155-2401." As discussed above, investigators conducted a controlled purchase of
 24 methamphetamine from Jose Luis IBARRA VALLE and followed him to 19065 21st
 25 Avenue Northeast, Lake Forest, Washington on March 19, 2020.

26
 27 ⁶ As is discussed above, and further below, investigators believe this to be IBARRA VALLE's residence because
 28 TT4 subscriber information, surveillance, and TT4 location data places IBARRA VALLE at 19065 21st Avenue
 Northeast, Lake Forest Park, Washington.

1 35. A common call analysis was conducted between TT4 and IBARRA
 2 VALLE Phone 1 that showed the two phones contacted approximately 40 of the same
 3 phone numbers. Based on the subscriber information and the common call analysis,
 4 investigators believe that IBARRA VALLE is using TT4 to further his drug trafficking
 5 activities.

6 **3. Phone Tracker for TT4 and TT5**

7 36. On April 15, 2020, United States Magistrate Judge Paula McCandlis signed
 8 a search warrant authorizing location tracking for TT4 and TT5. Subsequent review of
 9 tracker data for TT4 shows that most nights TT4 stays at 19065 21st Ave NE Lake Forest
 10 Park, Washington. This is the same location as the subscriber address and the location to
 11 which investigators followed IBARRA VALLE following CS1's controlled purchase
 12 from IBARRA VALLE. TT4's tracker data and subscriber address, combined with
 13 surveillance, leads investigators to believe that IBARRA VALLE lives at 19065 21st Ave
 14 NE Lake Forest Park Washington.

15 **4. Attempted UC purchase from IBARRA VALLE**

16 37. On April 13, 2020, an undercover officer (UC1) began reaching out to
 17 IBARRA VALLE on TT4, via text message and phone call, in an attempt to purchase
 18 one pound of methamphetamine from IBARRA VALLE. UC1 had a difficult time
 19 communicating with IBARRA VALLE as UC1 is primarily an English speaker and
 20 IBARRA VALLE seems to be primarily a Spanish speaker. Given the language barrier
 21 and difficulties communicating between UC1 and IBARRA VALLE, investigators later
 22 used another undercover officer (UC2), who is fluent in Spanish, to speak to IBARRA
 23 VALLE.

24 38. On April 13, 2020, UC1 had a Spanish-language text message conversation
 25 with TT4. The following is a rough translation of that text message conversation:
 26
 27
 28

1 UC1: What's up, I am Miguel's⁷ friend el guero

2 UC1: Miguel gave me you number

3 TT4: What's been going on, friend

4 TT4: Call me

5 UC1: Do you speak English? My Spanish is really bad

6 39. UC1 then received a call from TT4 and UC1 had a recorded phone
7 conversation with IBARRA VALLE.⁸ The following is a rough translation and
8 transcription of the call:

9 TT4: What's going on old man, how've you been?

10 UC1: Hey, really good, and you?

11 TT4: What's been up?

12 UC1: Do you speak English, cause my Spanish is really bad.

13 TT4: No, but which Miguel gave you the number? Which Miguel?

14 UC1: Miguel passed me your number

15 TT4: Which Miguel?

16 UC1: Well, Miguel from Shoreline. By the water.

17 TT4: Ok, very well

18 40. The recorded call then ended because UC1 and IBARRA VALLE had a
19 difficult time communicating. Law enforcement later compared a recording of IBARRA
20 VALLE's voice obtained during CS1's recorded controlled buy with IBARRA VALLE
21 and the recorded call between UC1 and IBARRA VALLE and believe it to be the same
22 person. UC1 then continued with the following text message conversation with IBARRA
23 VALLE on TT4⁹:

24
25 ⁷ Investigators provided IBARRA VALLE with fictitious information about "Miguel" throughout their
26 conversations. Investigators believe that IBARRA VALLE knows a person named Miguel, and used that name as
ruse in an attempt to gain IBARRA VALLE's trust.

27 ⁸ This phone conversation occurred primarily in Spanish.

28 ⁹ This text message conversation occurred primarily in Spanish, although UC1 did at times use English words and it
appears that IBARRA VALLE used a translation service, such as "Google Translate", to have some of the messages
translated into English.

1 UC1: Are you alright?

2 TT4: Which Miguel gave you the number?

3 UC1: Everett

4 TT4: Where are you at. How much do you need

5 UC1: Mt. Vernon. One of water

6 UC1: Later this week

7 TT4: Where are you? And how much do you need?

8 UC1: Mt Vernon. 1

9 TT4: I don't understand you

10 UC1: I live in Mt Vernon, I need one pound of water

11 UC1: Do you understand me?

12 TT4: A friend who speaks English is going to speak to you ahead, I don't know
13 what you're talking about.

14 UC1: Ok

15 41. Based on training and experience, investigators believe that in the above
16 text message conversation, IBARRA VALLE asked UC1 where UC1 lived and what
17 quantity of drugs UC1 wanted. UC1 asked IBARRA VALLE for "water," which is
18 coded language for methamphetamine, and told IBARRA VALLE that UC1 lived in the
19 Mount Vernon, Washington area. Investigators believe that when the text message
20 saying "A friend who speaks English is going to speak to you ahead, I don't know what
21 you're talking about," meant that IBARRA VALLE would have an English-speaking
22 associate contact UC1.¹⁰

23 42. Later on the same day, April, 13, 2020, UC1 received a phone call from an
24 unknown male, who identified himself as "PAISA." PAISA called from phone number
25 (425) 626-8865 ("TT6") and spoke English. Subpoenaed T-Mobile records show this
26 phone is a prepaid phone with no listed subscriber name or subscriber address. The

27 _____
28 ¹⁰Discussions about the meaning of IBARRA VALLE's responses of, "I don't understand you" and "...I don't know what you're talking about", are discussed below.

1 following is a rough transcription of the recorded call between UC1 and "PAISA"; the
2 call was in English:

3 UC1: Hello

4 PAISA: Yeah, this is PAISA man, how are you?

5 UC1: Hey, what's going on?

6 PAISA: Not much

7 UC1: Well is your buddy the one that was texting me?

8 PAISA: Yeah, who's give you my number?

9 UC1: A, Miguel from Everett.

10 PAISA: Miguel?

11 UC1: Yeah

12 PAISA: What Miguel? Ponalero (Inaudible)?

13 UC1: No, that's all he told me, Miguel from Everett.

14 PAISA: From Everett?

15 UC1: Yeah, from Everett.

16 PAISA: So, where you are?

17 UC1: He said he met your buddy down there and he said that he was gonna tell
18 you that I was gonna call. I live up in Mount Vernon.

19 PAISA: Mount Vernon?

20 UC1: Yeah, I need to buy the same thing as Miguel

21 PAISA: Oh, uh the same thing Miguel like have?

22 UC1: Yes, the same thing Miguel bought, that's what I need.

23 PAISA: Oh...so how much you wanted?

24 UC1: Oh, just one.

25 PAISA: Just one, one piece?

26 UC1: Yeah, just one piece for the first time

27 PAISA: Uh hu

28 PAISA: So where can I meet you? Or...

1 UC1: Does one piece, how much for the one piece.

2 PAISA: Um?

3 UC1: I live around Mount Vernon so

4 PAISA: You live in the Mount Vernon, you want me to go over there to Mount
5 Vernon?

6 UC1: Or we could meet in the middle.

7 PAISA: Uh...

8 UC1: Is it going to be today? Or in a couple days?

9 PAISA: So let me think a, um, no if you want today, I can go over there.

10 UC1: Well I'm working today, I'm, I'm farther up north. Um, I won't be back to
11 Mount Vernon till probably Wednesday or Thursday.

12 PAISA: Oh, ok. Well, so you call me when you get ready, you know?

13 UC1: Yeah, you want me to call you or the other guy or text?

14 PAISA: Uh, just call me when you are ready.

15 UC1: Ok

16 PAISA: Alright

17 UC1: Sounds good, I'll give you a call.

18 PAISA: Ok then.

19 UC1: Ok, thanks bro, bye.

20 PAISA: Bye.

21 43. In the above conversation, UC1 told PAISA that he/she wanted the same
22 thing as Miguel and wanted "one." UC1 again used the name Miguel to insinuate that
23 UC1 and, in this instance, PAISA, had the same mutual acquaintance and would therefore
24 make PAISA more likely to sell drugs to IBARRA VALLE. Based on training and
25 experience, investigators believe PAISA's response of, "So how much you wanted?" and
26 "Just one, one piece?" was a question and then confirmation about the quantity of drugs
27 UC1 wanted to buy. UC1's intention was to buy one pound of methamphetamine, but
28 law enforcement knows that "one piece" can also refer to heroin. Investigators intended

1 to buy methamphetamine as that was the drug purchased by CS1 in the controlled buy
 2 with IBARRA VALLE, and it is unclear whether PAISA understood that UC1 was
 3 looking to purchase methamphetamine; this may have been a miscommunication
 4 between UC1 and PAISA. Regardless, investigators believe PAISA made arrangements
 5 to sell drugs to UC1.

6 44. On the same day, after the phone conversation, UC1 and PAISA, using
 7 TT6, had the following text message conversation in English:

8 UC1: Hey bro can I text you? Im at work, people around

9 PAISA: Ok

10 UC1: I told your friend I need one full one of water

11 UC1: How much

12 UC1: Can you help me out bro?

13 PAISA: The price for last 3200

14 UC1: I was looking for 2800

15 PAISA: The meaning of I can do it for 3

16 UC1: 3? Ok

17 UC1: Can u meet Thursday?

18 45. Based on training and experience, investigators believe that in the above
 19 conversation, UC1 asked for “one of water” and what the price would be. Law
 20 enforcement knows “water” is coded language for methamphetamine. Based on training
 21 and experience, law enforcement believes that PAISA told UC1 the price for the last
 22 pound of methamphetamine that PAISA sold (to an unknown party) was \$3200, but after
 23 negotiations, PAISA agreed to sell a pound of methamphetamine to UC1 for \$3000.

24 46. A review of TT4’s toll records shows that on April 13, 2020, TT4 and TT6
 25 were in contact approximately six times, the first starting at approximately 11:03 a.m. Of
 26 those six contacts, TT4 had two outgoing phone calls, two outgoing text messages, and
 27 two incoming phone calls. The first contact between TT4 and TT6 that occurred at
 28 approximately 11:03 a.m., was an approximately three minute voice call from TT4 to

1 **TT6.** This first contact between **TT4** and **TT6** on April 13, 2020, occurred in the midst
2 of the text message conversation between UC1 and IBARRA VALLE, wherein UC1 and
3 IBARRA VALLE were having trouble communicating and arranging the deal.
4 Investigators believe that is when IBARRA VALLE (**TT4**) called PAISA (**TT6**) to
5 discuss PAISA reaching out and selling drugs to UC1.

6 47. The next day—on April 14, 2020—UC1 and PAISA had the following text
7 message conversation:

8 UC1: ? Hey bro

9 PAISA: What's up what's

10 UC1: Waiting on you to text

11 PAISA: Are you ready for Thursday

12 UC1: Yes. U?

13 UC1: I will be off early Thursday

14 48. Over the next two days—on April 15, 2020 and April 16, 2020—UC1 had
15 multiple recorded phone calls and text message conversations with PAISA discussing the
16 meeting location and time for UC1 to meet PAISA to purchase drugs. In these
17 communications, UC1 and PAISA agreed to meet near the Everett, Washington area.

18 49. On April 16, 2020, following UC1's conversations with **TT6**, UC1 met
19 with an individual who identified himself as PAISA, near Everett, Washington. The
20 person UC1 met with, PAISA, had the same sounding voice as the person who UC1
21 talked to on **TT6**. Investigators therefore believe the user of **TT6** and the person UC1
22 met with, is the same person. The following is a rough transcription of the recorded
23 meeting between UC1 and PAISA:

24 UC1: What's going on Bro?

25 PAISA: Bueno, how are you man?

26 UC1: Good, how are you, what's going on

27 PAISA: So, how you want to do this? I need to go and pick it up, you'll have to
28 come with me

1 UC1: Come with you?

2 PAISA: Yeah

3 UC1: I thought you were going to bring it here?

4 PAISA: No

5 PAISA: It's a lot of shit man, lets go and grab it

6 UC1: Where is it?

7 PAISA: Two exits more

8 UC1: Two exits more? Well, I brought the money.

9 PAISA: Yeah, well, you can keep the money, then you can give me the money

10 when I go in there and then give it to you

11 UC1: Well, I dropped my friend off inside.

12 PAISA: In the store?

13 UC1: In the Home Depot so he could buy our stuff but I didn't want him here

14 while I did it so I got to wait for him.

15 PAISA: It's ok

16 UC1: Okay, well I, well I guess I'll call you as soon as he's done.

17 PAISA: Ok

18 UC1: Are you sure you don't have it?

19 PAISA: Yeah, I know, I know, you have the money.

20 UC1: I know buy you made me drive all the way down here. And you don't have
21 it.

22 PAISA: I have it close to here.

23 UC1: Is it at a house or where?

24 PAISA: A yeah, at a motel

25 UC1: Yeah, I don't want to go to somebody's house. Somebody I don't know.

26 PAISA: No, you don't have to go in there. I can go in there and grab it,
27 and...[trails off, inaudible]

1 UC1: Ok, well let me wait for my buddy, and if you're going to bring me to where
2 a bunch of people are then I'm going to bring him

3 PAISA: No, no, there's not....there is only me and the other dude there's not a
4 bunch of people there.

5 UC1: Ok, Ok, well, I guess, let me wait for my buddy and I'll call you right now

6 PAISA: Mmm, hmm, Ok man.

7 UC1: Alright.

8 50. During the above meeting, UC1 had \$3,000 in pre-recorded buy funds and
9 showed the money to PAISA. During the conversation, UC1 learned from PAISA that
10 PAISA did not have the one pound of methamphetamine as previously discussed. UC1
11 understood from PAISA that PAISA needed to go pick up the methamphetamine at a
12 motel nearby and that PAISA wanted UC1 to follow PAISA to go pick it up. For officer
13 safety reasons, UC1 did not travel with PAISA to pick up the methamphetamine. UC1
14 made an excuse saying that UC1's friend was inside the Home Depot and that UC1
15 needed to wait for the friend before UC1 could leave the area. UC1 later attempted to
16 call and text message PAISA in order pick up the methamphetamine, but UC1 never
17 received a response from PAISA.

18 51. Based on training, experience, and the conversations between UC1 and
19 IBARRA VALLE, investigators believe IBARRA VALLE used TT4 to communicate
20 with UC1 to arrange the sale of drugs. Specifically, when IBARRA VALLE sent a text
21 message asking, "where you at. How much do you need" to the UC telephone, IBARRA
22 VALLE was asking where UC1 was located and what quantity of drugs UC1 needed.
23 UC1 responded with a location (Mount Vernon, Washington) and commonly used code
24 language for methamphetamine. IBARRA VALLE, however, indicated that he could not
25 understand UC1. Nevertheless, IBARRA VALLE sent a text message to the UC
26 telephone saying that someone who spoke English would contact UC1. UC1 later
27 received a call from a male who identified himself as PAISA, using (425) 626-8865.
28 Through subsequent phone call conversations and text messages, UC1 arranged for the

1 purchase of a pound of methamphetamine for \$3,000. Based on training, experience, and
2 these communications, investigators believe that IBARRA VALLE said an English-
3 speaking person would contact UC1, an English speaking person did contact UC1, and
4 that person arranged a drug deal with UC1. Investigators further believe that IBARRA
5 VALLE was trying to sell drugs to UC1 but, given the language barrier, it is possible
6 IBARRA VALLE decided to let UC1 buy from someone else, i.e., PAISA.

7 52. Based on training and experience, investigators believe that when IBARRA
8 VALLE sent text messages to UC1 saying, "I don't understand you" and "...I don't know
9 what you're talking about" in response to UC1 twice asking for "water" and providing a
10 location (Mount Vernon, Washington), that IBARRA VALLE understood UC1 was
11 attempting to buy drugs but could not understand the rest of the conversation. This is
12 evidenced by IBARRA VALLE telling UC1 that "a friend who speaks English" is going
13 to talk to UC1, and UC1's subsequent drug conversations with "PAISA" and TT4's toll
14 contacts with PAISA.

15 53. The above facts combined with the toll record contacts between TT4 and
16 TT6 on April 13, 2020, UC1's communications with TT6, and UC1's meeting with
17 PAISA, investigators believe IBARRA VALLE used TT4 to communicate to PAISA
18 (TT6) about PAISA selling drugs to UC1.

19 54. UC1's meeting with PAISA lasted only a few minutes, and occurred around
20 12:00 p.m., on April 16, 2020. Shortly after PAISA left the meeting with UC1, UC1
21 started trying to communicate with PAISA at approximately 12:05 p.m. UC1 called TT6
22 multiple times and also sent multiple text messages to TT6, but received no response.
23 UC1 attempted to contact PAISA until approximately 1:58 p.m., on April 16, 2020. A
24 review of toll records for TT4 shows that during the time that UC1 was unsuccessfully
25 attempting to contact PAISA on TT6 (between 12:05 p.m., to 2:00 p.m.), that at
26 approximately 12:46 p.m., TT4 (IBARRA VALLE) received a phone call from TT6
27 (PAISA) that lasted a little less than a minute. Based on the timing of the call, as well as
28 the following conversations, law enforcement suspect that IBARRA VALLE and PAISA

1 talked about UC1 and how they did not know UC1, or the fictitious person named
 2 Miguel. PAISA's unfamiliarity with Miguel could be one of the reasons that PAISA
 3 discontinued communications with UC1 following UC1 and PAISA's meeting.

4 55. A review of toll records shows that TT4 and TT6 had a total of eleven
 5 communications on April 16, 2020. The first communication was at 9:21 a.m., which
 6 was before UC1 reached out to PAISA, and the last communication was at 6:25 p.m.,
 7 several hours after PAISA stopped communicating with UC1.

8 56. When investigators could not contact PAISA to complete the
 9 methamphetamine purchase, UC1 and UC2 called IBARRA VALLE to have IBARRA
 10 VALLE get PAISA to contact the UCs to sell them methamphetamine. The UCs called
 11 IBARRA VALLE at 1:20 p.m. but the call went unanswered. The UC's then received a
 12 text message from TT4 at 1:21 p.m., and had a brief Spanish-language text message
 13 conversation with TT4. The following is a rough translation of the text message
 14 conversation between the UCs and TT4:

15 TT4: What's going on

16 UCs: Speak to my friend. We are in Everett

17 TT4: Which friend

18 57. In the above conversation, UC1 asked IBARRA VALLE to talk to UC2
 19 with the intent of having UC2 assist with organizing and completing the purchase of
 20 drugs.

21 58. Then, at approximately 1:25 p.m., on April 16, 2020, UC2 had a recorded
 22 Spanish-language conversation with IBARRA VALLE on TT4. Law enforcement
 23 compared a recording of IBARRA VALLE's voice obtained during CS1's recorded
 24 controlled buy with IBARRA VALLE and the recorded calls between the UCs (UC1 and
 25 UC2) and believe it to be the same person. The following is a rough transcription and
 26 translation of the recorded call:

27 UC2: Hello?

28 TT4: Tell me

1 UC2: Hello buddy, I'm right there with "el guero" [referring to UC1]. El guero is
2 my friend. Your buddy isn't answering.

3 TT4: What buddy, old man?

4 UC2: The one that speaks English, the paisa. We saw him here in Everett but he
5 said that he had to go get the stuff, but he's not answering. That he was going to
6 come back. Guero says that he showed Paisa the money and he said that he was
7 going to pick something up, but he hasn't called back.

8 TT4: Ok, I'll tell him to call you back. Hey, but who are you, dude? You're with
9 that dude?

10 UC2: Yeah, I was inside the store when he was here, but we drove to Everett, and
11 he's not answering.

12 TT4: But you're with that dude?

13 UC2: With my friend, El guero.

14 TT4: Oh, and where are you from, man?

15 UC2: What do you mean, where? From Mount Vernon.

16 TT4: No yeah, but where are you from, Mexican or what are you?

17 UC2: Oh, no from Michoacan

18 TT4: Michoacan

19 UC2: Yes. What's that?

20 TT4: What part of Michoacan are you from, dude?

21 UC2: Right there in Colima

22 TT4: No but, what, what, what?

23 UC2: Do you know Colima?

24 TT4: Yes, what part of Colima are you from?

25 UC2: Oh, I wasn't born there

26 TT4: No?

27 UC2: No.

28 TT4: And then?

1 UC2: How?

2 TT4: Do you know it or don't you?

3 UC2: Yes, yes.

4 TT4: What part do you know?

5 UC2: Right there by "Cobayana."

6 TT4: Oh, ok. We'll call you back dude. Hold on.

7 UC2: Ok, cause we're here waiting.

8 TT4: Alright then.

9 59. Through training and experience, investigators believe that IBARRA
10 VALLE confirmed he knew PAISA when he said that he will have PAISA or himself call
11 the UCs (UC1 and UC2) back. A few minutes later, at approximately 1:28 p.m., TT4
12 called the UC telephone. The following is a rough transcription and translation of the
13 Spanish-language conversation between UC2 and IBARRA VALLE:

14 UC1: Hello

15 TT4: Hey, where is your buddy at?

16 UC2: How're you?

17 TT4: Hey man

18 UC2: What's up?

19 TT4: Hey, ask this dude to explain to you really well who gave that dude the
20 number, because the truth, I don't know that Miguel guy, dude

21 UC2: (UC2 to UC1)¹¹ He's asking who gave you his number

22 UC1: Miguel

23 TT4: But what Miguel?

24 UC1: He told me he's from Everett but went back south, he told me to call you
25 directly. He said that he spoke to you and told you that I was going to call you.

26
27
28 ¹¹ In this conversation, UC2 acted as translator for UC1. The parentheses indicate the audio picked up by the recording wherein UC2 asks UC1 questions in English that were posed by IBARRA VALLE in Spanish.

1 UC2: Hey, he said it was Miguel and he was in Everett, and he told my buddy
2 here to give you a call

3 TT4: But I don't know any Miguel, old man.

4 UC2: (UC2 to UC1) Do you know what he looks like?

5 UC1: Short, fat

6 UC2: He said that he's a short, kinda fat Mexican

7 TT4: Short and kind of fat?

8 UC2: Uh-huh

9 TT4: And is he bald, ask him if he's bald

10 UC2: (UC2 to UC1) Is he bald?

11 UC1: (UC1 to UC2) He had a hat on

12 UC2: No, he had a hat on. But that his name was Miguel and he lives in Everett

13 UC1: (UC1 to UC2) Tell him that I used to get if from him but he was too far
14 south, and you guys are a little further north

15 TT4: Short guy with a beard? Is he a short guy with a beard?

16 UC2: (UC2 to UC1) Does he have a beard?

17 UC1: (UC1 to UC2) Yeah

18 UC2: Yes, that he had a beard, short, and kind of fat.

19 TT4: Oh, I'll call him right now, tell him. Tell him not to get stressed; I'll call him
20 right now.

21 UC2: Ok

22 UC2: (UC2 to UC1) He's going to call him right now.

23 60. Based on training and experience, law enforcement believe that in the
24 above conversation, IBARRA VALLE displayed continued concern about how the UCs
25 (UC1 and UC2) got his phone number. IBARRA VALLE expressed that he did not
26 know "Miguel"—the person whom UC1 had said provided IBARRA VALLE's phone
27 number during earlier conversations. These statements by IBARRA VALLE, including
28 IBARRA VALLE's mention of "Miguel", without being prompted by the UCs, combined

1 with the UCs calling from the same phone number, indicate that IBARRA VALLE knew
 2 UC1 to be the same person with whom IBARRA VALLE spoke on April 13, 2020, when
 3 UC1 was trying to arrange to buy drugs from IBARRA VALLE. Based on training and
 4 experience, investigators know that drug dealers are often suspicious and cautious when
 5 it comes to conducting drug sales with people they do not know, as the potential customer
 6 could be law enforcement or someone looking to rob the drug dealer. In this instance,
 7 investigators believe IBARRA VALLE was trying to verify that the UCs were safe to
 8 deal with so he would be more comfortable selling drugs to or arranging for someone else
 9 to sell drugs to the UC(s). Ultimately, investigators believe that IBARRA VALLE was
 10 satisfied with the UCs explanation of who "Miguel" was and that when IBARRA
 11 VALLE said, "Oh, I'll call him right now, tell him. Tell him not to get stressed; I'll call
 12 him right now" that IBARRA VALLE agreed to call PAISA for the UCs. According to
 13 toll records, IBARRA VALLE (TT4) did not immediately reach out to PAISA (TT6).
 14 According to toll records, the next contact between the TT4 and TT6 does not occur until
 15 approximately 2:00 p.m.; UC1 never spoke to PAISA again.

16 61. At approximately 1:36 p.m., on the same day, UC1 and UC2 had another
 17 recorded phone call with IBARRA VALLE on TT4. The following is a rough translation
 18 and transcription of the recorded call:

19 TT4: Tell me cousin

20 UC2: What's up?

21 TT4: They're going to call you right now

22 UC2: They're going to call?

23 TT4: Yeah, don't get stressed, dude

24 UC2 to UC1: He said they're going to call, are you going to wait for them

25 UC1 to UC2: How long?

26 UC2: He's asking how long?

27 TT4: Tell him that I'm investigation who is the one who gave him the number.

28 What car did that friend have?

1 UC2 to UC1: he's asking what car he was driving

2 UC1 to UC2: The guy today?

3 TT4: Miguel

4 UC1 to UC2: Today?

5 UC2 to UC1: No, the last time that you...

6 UC2: the last time that he saw him?

7 TT4: Yes

8 UC2 to UC1: Last time you saw him

9 UC1 to UC2: Jeep, I think. Red or Orange

10 UC2: He said orange or red. Jeep

11 TT4: Orange or red?

12 UC2: He doesn't know if the car he's driving is orange or red, but that it was a
13 Jeep

14 UC1 to UC2: I met him a couple of times

15 TT4: A Jeep?

16 UC2: Yeah, a jeep or something like that

17 TT4: Oh, ok. They are going to call you here, shortly

18 UC2 to UC1: He said that they are going to call you right now.

19 UC1 to UC2: Yeah but how much longer?

20 62. In the above conversation, investigators believe that IBARRA VALLE
21 continued to display distrust and skepticism towards the UCs and how the UCs got TT4.
22 This is evident when IBARRA VALLE said he is investigating who provided the number
23 to UC1, followed by a number of questions about what "Miguel" looked like, and
24 questions about what kind of car he (Miguel) drove. Ultimately, IBARRA VALLE said
25 that "they," indicating somebody, perhaps PAISA, would call the UCs. As noted above,
26 PAISA and UC1 never spoke again but investigators did not know at the time that PAISA
27 would not be back in touch with UC1. Based on training and experience, the UCs
28

1 understood IBARRA VALLE to mean that the person calling the UCs would be the
2 person selling drugs to the UCs.

3 63. At approximately 1:50 p.m., approximately fifteen minutes following the
4 above conversation with IBARRA VALLE, the UCs had a Spanish-language text
5 message conversation with TT4. The following is a rough translation of that text
6 message conversation:

7 UCs: We are taking off

8 TT4: They are going to call you

9 UCs: Ok

10 64. After having not heard anything for approximately fifteen minutes, the UCs
11 sent a message to TT4 saying they were leaving. In response, IBARRA VALLE
12 indicated someone would call the UCs, and the UCs understood this conversation to
13 mean that IBARRA VALLE would have someone call the UCs to complete the drug
14 transaction.

15 65. On the same day—between 2:08 p.m., and 2:18 p.m.—after the UCs
16 received no call from anyone, TT4 and the UCs had a Spanish-language text
17 conversation. The following is a rough translation of the text message conversation:

18 TT4: Did they call you

19 UCs: K

20 UCs: No

21 UCs: Nobody called, we already left

22 TT4: Excuse me, but we don't know you

23 TT4: We don't know a Miguel

24 66. On the same day, at approximately 2:21 p.m., UC1 received a phone call
25 from (425) 247-3705, and the user identified himself as "Scottie." Scottie spoke English,
26 and the phone call was recorded. The following is a rough transcription of the
27 conversation between UC1 and Scottie:

28 UC1: Hello

1 **Scottie:** Hello

2 **UC1:** Hello

3 **Scottie:** Hello. how you doing?

4 **UC1:** Hey, Good, who's this?

5 **Scottie:** Scottie, who's this?

6 **UC1:** Scottie?

7 **Scottie:** Yeah.

8 **UC1:** Scott, this is Gabriel.

9 **Scottie:** Who, Gabriel?

10 **UC1:** Yeah.

11 **Scottie:** Oh, Gabriel, yeah um...

12 **UC1:** What's going on?

13 **Scottie:** I was given this number by a mutual friend of ours.

14 **UC1:** Ok was it...

15 **Scottie:** He said you needed something?

16 **UC1:** Well yeah, we were supposed to meet up today but uh I don't know what's
17 going on. Problem's on his end, not mine.

18 **Scottie:** Yeah, yeah, he gave me your number um I guess for us to handle it, I'm
19 not sure, um, yeah.

20 **UC1:** Well what'd he tell you?

21 **Scottie:** Uh, a pound.

22 **UC1:** Yeah, for... did he tell you a price?

23 **Scottie:** Um, no, uh... was that...night or day.

24 **UC1:** Oh ok, ah today, but the, what's that?

25 **Scottie:** No I mean is it for nighttime or daytime?

26 **UC1:** Uh for daytime, the, the uh water.

27 **Scottie:** Daytime, ok.
28

1 UC1: Yeah, we were supposed to, the problem is I'm already headed back up
2 north because I don't know what the hell that guy's doing but I'm already, I'm
3 already leaving.

4 Scottie: Oh ok, well where are at north are you? Uh, Mount Vernon?

5 UC1: Well I'm headed back to, yeah I'm headed back to the Mount Vernon-
6 Burlington area.

7 Scottie: Ok, um well possibly bring it up to you, um, you know, so...

8 UC1: What's that?

9 Scottie: Um I possibly could bring it up to you so let me um touch base with him
10 and I'll fuckin' call you back.

11 UC1: Ok, yeah call me.

12 Scottie: Yeah, we could bring it up to ya.

13 UC1: Ok, well call me and we'll see where we're at.

14 Scottie: Ok, bye.

15 67. Based on training and experience, investigators believe that IBARRA
16 VALLE had Scottie contact UC1 about buying drugs, however, as discussed further
17 below, there are no toll records between Scottie and IBARRA VALLE. In the
18 conversation described above, Scottie said that he had been contacted by a "mutual
19 friend" and that he heard UC1 was looking for one pound. Scottie asked if UC1 needed
20 "daytime" or "nighttime," to which UC1 responded he needed "daytime." Based on
21 training and experience, investigators know "daytime" is coded language for
22 methamphetamine and "nighttime" is coded language for heroin. Law enforcement
23 believes that Scottie agreed to sell one pound of methamphetamine to UC1. As is
24 explained further below, investigators believe IBARRA VALLE is the "mutual friend"
25 who arranged for Scottie to call UC1 to sell UC1 a pound of either "daytime" or
26 "nighttime;" Scottie agreed to sell the "daytime" to UC1.

27 68. At approximately 2:39 p.m., after UC1's phone call with Scottie, UC1
28 received a phone call from IBARRA VALLE (TT4). UC1 and IBARRA VALLE had

1 the following phone conversation that occurred in English and Spanish; UC2 was not
 2 present when IBARRA VALLE called. The following is a rough translation and
 3 transcription of the recorded phone call:

4 UC1 [in English]: Hello

5 TT4 [in Spanish]: Hello

6 UC1 [in English]: Hey

7 TT4: [in English] Hey, [in Spanish] what did he tell you?¹²

8 UC1 [in English]: My friend is not here anymore

9 TT4: [in English] My friend, [in Spanish] where is he?¹³

10 UC1 [in English]: My friend left

11 TT4 [in Spanish]: Where?

12 UC1 [in English]: Well, to the bar, I don't know

13 TT4 [in Spanish]: Well, wasn't he with you?

14 UC1: [in English] No, a white guy, [in Spanish] the white, my Spanish is really
 15 bad. A white guy called me. You sent me to call.¹⁴

16 TT4 [in Spanish]: But your friend?

17 UC1: [in Spanish] A white guy [in English] called me. Is he with you?¹⁵

18 TT4: [in English] Yes, [in Spanish] yes.¹⁶

19 UC1 [in English]: Tell him to call me back because I already went north.¹⁷

20 TT4: Ok¹⁸

21 UC1 [in English]: Ok, tell him to call me back, bye.¹⁹

22 69. Investigators believe that in this call, IBARRA VALLE asked where UC2
 23 was and UC1 said that UC2 had left. UC1 then asked if IBARRA VALLE had told the

24 ¹² After "Hey," the rest of the statement was spoken in Spanish.

25 ¹³ After "My friend," the rest of the statement was spoken in Spanish.

26 ¹⁴ After "No, a white guy," the rest of this statement was spoken in Spanish.

27 ¹⁵ "A white guy" was spoken in Spanish, and the rest of this statement was spoken in English.

28 ¹⁶ The first "yes" was spoken in English, and the second was spoken in Spanish.

¹⁷ This was in English.

¹⁸ This could be Spanish or English.

¹⁹ This was in English.

1 “white guy” to call UC1. IBARRA VALLE indicated that he did have the “white guy”
2 call UC1. UC1 believes IBARRA VALLE understood the “white guy” to be Scottie as
3 Scottie did not have a Hispanic accent and PAISA appeared to be Hispanic and spoke
4 English with an accent common to native Spanish-speakers.

5 70. After the phone call, UC1 had a Spanish-language text message
6 conversation with TT4. The following is a translation of that conversation:

7 UC1: A white guy called you

8 UC1: Do you know him?

9 TT4: Yes

10 TT4: Where is your friend? Wasn’t he with you?

11 UC1: I left his house

12 71. Investigators believe that in this text message conversation, UC1 asked
13 IBARRA VALLE if he knew the “white guy” that called UC1. IBARRA VALLE sent a
14 text message in reply and confirmed he did know the person who contacted UC1. Based
15 on training and experience, investigators believe that IBARRA VALLE arranged for
16 Scottie to call UC1 so that Scottie could sell drugs to UC1.

17 72. Later the same day—between 3:10 p.m. and 4:04 p.m.—UC1 had the
18 following text conversation with (425) 247-3705, which was the number previously used
19 by Scottie:

20 UC1: What happened bro. Thought u gonna call back

21 Scottie: Yeah sorry really busy it’s super hot in Everett so heading north in a
22 minute

23 Scottie: I have one stop to make in Stanwood then I’m heading to you, and the
24 price is \$3000

25 UC1: Im not paying 3 after they screwed up this morning. I will order out from
26 somewhere else

27 UC1: Are u with them or separate?
28

1 73. Investigators believe that in the above conversation, Scottie explained that
2 he was heading towards UC1, he had a stop to make in Stanwood, and the price for the
3 previously discussed one pound of methamphetamine was \$3,000. UC1 then expressed
4 frustration that the deal earlier in the day had not been completed and that UC1 was no
5 longer willing to pay \$3,000. The conversation ended for that day, and no drug purchase
6 took place.

7 74. Two days later, on April 18, 2020, UC1 and Scottie had the following
8 English-language text message conversation:

9 **UC1:** hey bro can u get me some this week?

10 **Scottie:** How much can you spend

11 **UC1:** as much as I need. It wasn't price problem they mess up.

12 **UC1:** What is price for 1 daytime? 1 nighttime?

13 75. In the above conversation, Scottie asked UC1 how much UC1 could spend,
14 and UC1 indicated it was not about the money but that the other guys messed up. Scottie
15 stopped responding to UC1's text message and phone calls, and UC1's attempted
16 purchase of methamphetamine was not completed.

17 76. Based on training, experience, and these texts, investigators believe that
18 IBARRA VALLE contacted Scottie, or had someone else contact Scottie, to arrange the
19 sale of drugs to UC1. But, as mentioned above, there are no toll records connecting TT4
20 to Scottie's number (425-247-3705). As discussed further below investigators have not
21 yet discovered how, or if, Scottie and IBARRA VALLE communicated directly.
22 Investigators believe that when Scottie mentioned their "mutual friend," he was referring
23 to IBARRA VALLE, or perhaps an intermediary. In addition, when IBARRA VALLE
24 confirmed that he knew the "white guy," combined with Scottie's knowledge that UC1
25 needed 1 pound of drugs, further indicates to investigators that Scottie had been contacted
26 by IBARRA VALLE, or an intermediary, after UC1 told IBARRA VALLE that PAISA
27 did not come back with drugs.
28

1 77. The subscriber company for 425-247-3705 is called "Bandwith."
2 According to Bandwith's website, "bandwith.com," Bandwith is a "Tier 1 nationwide all-
3 IP voice network," which investigators understand to be an internet based phone
4 company that allows users to make and receive phone calls over the internet. A subpoena
5 return from Bandwith lists Scott GARTLAND as the subscriber name for 425-247-3705.
6 A check with the Washington DOL shows one Scott GARTLAND in Washington State
7 with a listed address of 410 4th Avenue, Seattle, Washington, 98104. NCIC shows that
8 there is an individual named Scott GARTLAND who has criminal convictions in
9 Washington State. According to NCIC, Scott GARTLAND has seven felony
10 convictions. Three of the felony convictions are for controlled substance violations
11 wherein GARTLAND was convicted in 2007, 2013, and 2019, respectively.
12 GARTLAND also has felony convictions for forgery, financial fraud, second degree
13 burglary, and taking a motor vehicle without permission. All of these convictions
14 occurred before 2007; GARTLAND has several misdemeanor convictions as well. Based
15 on training and experience, given the similar name, Scottie and Scott, investigators
16 suspect that Scottie could be Scott GARTLAND.

17 78. A review of IBARRA VALLE's toll records during his conversations with
18 UC1 about Scottie shows that IBARRA VALLE had several communications with 206-
19 430-4200, a T-Mobile phone subscribed to Humberto J. GARCIA at 2608 Center Road,
20 Everett, Washington. NCIC shows that there is an individual named Humberto GARCIA
21 who has criminal convictions in Washington State. According to NCIC, in Washington
22 alone, GARCIA has seven felony convictions, three of which are controlled substance
23 violations. GARCIA was convicted of the three controlled substance felonies in March,
24 April, and May 2018. The other Washington felonies include possession of a stolen
25 vehicle, bail jumping, and theft of a motor vehicle, all occurring in or before 2018.
26 GARCIA also has multiple misdemeanor convictions. NCIC also shows that GARCIA
27 also has misdemeanor convictions in Florida and Alaska.
28

79. A review of toll records shows that phone number 206-798-8559, with a subscriber name of Brian McLaren and a subscriber address of 410 4th Avenue, Seattle, Washington, 98104—the same address to which “Scottie”’s phone was registered—was in contact with IBARRA VALLE Phone 1 in March 2020, and had approximately 27 contacts. A check with Washington DOL has a listed address for Brian McLaren of 410 4th Avenue, Seattle, Washington, 98104; the same listed address as Scott GARTLAND. NCIC shows that there is an individual named Brian McLaren who has criminal convictions in Washington State. According to NCIC, Brian McLaren has four felony convictions from 2014 for stolen property, burglary, possession of a stolen firearm, and unlawful possession of a firearm; McLaren has no listed misdemeanors. A review of toll records shows that between April 20, 2020 and May 19, 2020, phone number 206-798-8559 (McLaren) was also in contact with Humberto J. GARCIA phone number 206-430-4200, approximately 103 times.

80. Based on training and experience and Washington DOL records, investigators suspect that Scottie, who investigators suspect could be Scott GARTLAND, who shares a listed address with Brian McLaren, is connected to Brian McLaren. Through tolls, 206-798-8559, a phone subscribed to McLaren, was in contact with 206-430-4200, a phone subscribed to Humberto J. GARCIA, who was/is in contact with TT4. Investigators suspect through these people, IBARRA VALLE arranged for UC1 to buy drugs from Scott.

81. In sum, investigators believe that IBARRA VALLE used TT4 to arrange drug purchases with UC1, UC2, PAISA (TT6), and Scottie.

5. Surveillance of IBARRA VALLE on May 14, 2020

82. On May 14, 2020, law enforcement established surveillance in the area of IBARRA VALLE’s residence at approximately 9:00 a.m. After establishing surveillance, investigators noticed that the vehicle IBARRA VALLE had previously been seen in was not at the residence. A review of TT4’s location data showed that TT4 was at or near 16540 NE 143rd Street, Woodinville, Washington. Investigators also reviewed

1 pole camera footage at 19065 21st Avenue Northeast, Lake Forest, Washington (IBARRA
2 VALLE's residence) and saw a vehicle, similar in appearance to the Nissan investigators
3 previously saw IBARRA VALLE driving, leave the area of IBARRA VALLE's
4 residence at about the same time TT4's tracker data left the house. Law enforcement
5 then established surveillance at 16540 NE 143rd Street, Woodinville, and saw that there
6 was a truck at the residence bearing Washington State license plate B40950S. A check
7 with the Washington department of licensing shows that the truck is registered to "Casa
8 Bonita" at 8315 216th Street, Southeast, Woodinville, Washington. The truck displayed a
9 company logo or advertisement for the Casa Bonita company, and a listed web address of
10 www.casabonita.com. A search of the company's website listed the company's address
11 as 8315 216th Street, Southeast, Woodinville, Washington, as well. Investigators did not
12 see IBARRA VALLE's vehicle at the residence.

13 83. Law enforcement stayed in the area and monitored location data for TT4
14 for several hours. In the afternoon, investigators saw the "Casa Bonita" truck leave the
15 area and drive north on State Route 9 towards Lake Stevens, Washington. While driving
16 to Lake Stevens, Washington, investigators saw that TT4's pings were in approximately
17 the same area as the truck. While following the truck, the truck stopped at a store in
18 Woodinville, Washington. When the truck left the store, law enforcement saw an
19 individual in the front passenger seat who was later identified as IBARRA VALLE. The
20 truck eventually stopped at a house on the corner of 16th Street Southeast, and 83rd
21 Avenue Southeast, Lake Stevens, Washington. Investigators continued surveillance and
22 later saw IBARRA VALLE working at the residence and that it was the same person who
23 law enforcement earlier saw in the front passenger seat of the truck. A review of the
24 phone tracker data indicated TT4 was at the same location as IBARRA VALLE. With
25 TT4's location data mirroring IBARRA VALLE's location, first at one site, then later at
26 another, law enforcement believes that, based on training and experience, this further
27 shows IBARRA VALLE is the user of TT4. Also, based on training and experience,
28

1 drug dealers often have legitimate jobs that help deflect suspicion about their illegal
2 sources of income.

3 **6. Toll Analysis of TT4 and TT5**

4 84. A review of TT4's tolls shows that between March 31, 2020, and May 27,
5 2020, **TT4** and **TT5** (Jesus GARNICA MELGOZA) were in contact approximately 295
6 times; **TT5** is **TT4**'s fifth most frequent contact. According to T-Mobile records, 425-
7 318-5534 (**TARGET TELEPHONE 5**) is subscribed to "Jesus Granica" with an
8 activation date of November 3, 2019 with an address of "2118 168TH ST SE BOTHELL
9 WA 98012-6056." A search of the Washington Department of Licensing records shows a
10 Washington driver's license in the name of Jesus MELGOZA GARNICA at the 168th
11 Street Southeast address and multiple vehicles registered to Jesus MELGOZA
12 GARNICA and Jesus GARNICA MELGOZA at the same address.

13 85. Investigators believe that Jesus MELGOZA GARNICA and Jesus
14 GARNICA MELGOZA are the same person and the user of **TARGET TELEPHONE 5**.
15 According to an NCIC search using the name Jesus GARNICA MELGOZA and his
16 Washington DOL date of birth, two individuals have used the name Jesus GARNICA
17 MELGOZA and the listed date of birth. Without fingerprinting one of the individuals,
18 investigators are at this time unable to determine which criminal history belongs to this
19 Jesus GARNICA MELGOZA. One of the criminal histories has convictions that include
20 controlled substances violations, driving violations, and making false statements. The
21 other criminal history has convictions that include assault, theft, and a driving violation.²⁰
22 Based on training and experience, drug dealers who are not indicted, arrested, and
23 convicted, often continue in their drug trafficking activities for extended periods of time;
24 it would not be unusual for a drug trafficker to continue selling drugs for several years
25 without the intervention of law enforcement. Further, investigators believe that Jesus

26 _____
27 ²⁰ In a previous sworn affidavit for **TT4** and **TT5**, only the criminal history for Jesus GARNICA MELGOZA that
28 included the controlled substance violation was mentioned. Upon further review, a separate criminal history for
Jesus GARNICA MELGOZA without controlled substance violations was discovered; that criminal history was not
included in the prior affidavit but is included here.

1 GARNICA MELGOZA is the same individual who is using TT5 and communicating
2 regularly with IBARRA VALLE on TT4.

3 86. According to toll records for TT5, IBARRA VALLE's Phone 1 was
4 approximately the third most frequent contact of GARNICA MELGOZA's TT5 between
5 February 15, 2020 and June 3, 2020. According to toll records for TT5, TT4 is the
6 fourth most frequent contact of GARNICA MELGOZA's TT5. Based on the toll records,
7 GARNICA MELGOZA's criminal history and some of the individuals that GARNICA
8 MELGOZA is suspected to be in contact with, discussed further below, investigators
9 believe GARNICA MELGOZA is a drug trafficking associate of IBARRA VALLE.

10 87. Below is a small selection of individuals that GARNICA MELGOZA's
11 **TARGET TELEPHONE 5** is in contact with:

12 a. 425-315-4663 – According to AT&T records, the listed user is
13 Austin W. HAMMOND. HAMMOND had 154 contacts with GARNICA
14 MELGOZA between February 22, 2020, and May 26, 2020. According to NCIC,
15 HAMMOND has a 2011 Washington State conviction for a controlled substance
16 violation.

17 b. 425-273-4314 – According to T-Mobile records, this phone is
18 subscribed to Eric WILLIAMS and had 21 contacts with GARNICA MELGOZA
19 between March 6, 2020, and May 31, 2020; the majority were in March 2020, with
20 one contact in May 2020. According to NCIC, WILLIAMS has a 2014 conviction
21 for a controlled substance violation.

22 c. 425-426-8887 – According to AT&T records, this phone is
23 subscribed to Jay PETERSON and had 118 contacts with GARNICA MELGOZA
24 between February 17, 2020, and March 22, 2020. According to NCIC,
25 PETERSON has a 2002 conviction for a controlled substance violation.
26
27
28

d. 425-244-3018 – According to Sprint records, this phone is subscribed to Carrie Burleson. Based on a law enforcement database query, investigators suspect this phone is used by Jennifer Marie FITZGERALD. FITZGERALD had 742 contacts with GARNICA MELGOZA between February 15, 2020, and May 26, 2020. According to NCIC, FITZGERALD has 2007 and 2012 convictions for controlled substance violations.

7. Analysis of TT4 and TT5 Location Information

88. As noted above, this is the second application for search warrants for location information in this case for TT4 and TT5. On April 15, 2020, United States Western District of Washington Magistrate Judge Paula L. McCandlis granted a search warrant for prospective location information for both phones. In response to the search warrants for TT4 and TT5, T-Mobile provided location information for both phones approximately every 15 minutes. Based on my training and experience, this is the standard way in which T-Mobile provides cell phone GPS location information. Investigators receive location information from T-Mobile in the form of longitude and latitude coordinates, with an accompanying estimation of the accuracy of those coordinates. The accuracy estimation provides information indicating the approximate possible distance of the phone from the provided latitude and longitude coordinates; the distance is provided in meters. In other words, T-Mobile provides the coordinates as well as information indicating how near or far the phone could be from those coordinates as measured in meters.

89. In regards to TT5, the accuracy of the provided coordinates has often been within 100 meters, meaning the phones are within 100 meters of the coordinates provided by T-Mobile. Location information for TT4 is often accurate, as displayed when investigators located and further identified IBARRA VALLE as the user of TT4 described above. However, it appears that when TT4 is in the area of IBARRA VALLE's residence, 19065 21st Avenue Northeast, Lake Forest Park, Washington, that the accuracy distance of TT4 often exceeds 1000 meters. The consistency of the less accurate pings when investigators believe IBARRA VALLA is at his residence, 19065

1 21st Avenue Northeast, Lake Forest Park, Washington, leads investigators to believe that
 2 when they receive less accurate location information around his residence, that TT4 is at
 3 the residence.²¹ Also, investigators have seen that the times at which T-Mobile provides
 4 location information for TT4 and TT5 are asynchronous so investigators do not receive
 5 location information for TT4 and TT5 at the same time, making it difficult to determine
 6 if and when the phones come together.

7 90. A review of the location information collected for TT4 and TT5 since
 8 April 15 shows that on April 17, April 21, May 28, and June 1, 2020, TT4 and TT5 were
 9 in close proximity to one another. On April 17, 2020, around approximately 7:30 a.m.,
 10 investigators twice received location information from T-Mobile for TT5 that, when
 11 searched via Google Maps, indicated TT5 was within a quarter mile of the intersection of
 12 Ballinger Way (aka State Highway 104) and 15th Avenue Northeast, Lake Forest Park,
 13 Washington.²² The intersection is less than a mile from IBARRA VALLE's residence at
 14 19065 21st Avenue Northeast, Lake Forest Park, Washington. Around the same time,
 15 location information provided by T-Mobile for TT4 indicated that IBARRA VALLE was
 16 in the area of his residence. While the location information data does not show the
 17 phones were right next to one another, it does show they were both within a mile of each
 18 other. Also of note is that this intersection is also less than a mile from the area where
 19 CS1 conducted the controlled purchase from IBARRA VALLE. Based on training and
 20 experience, law enforcement believes that it is possible that IBARRA VALLE and
 21 GARNICA MELGOZA met at some point during the time when the phones were close to
 22 one another.

23
 24
 25
 26 ²¹ As described above, on May 14, 2020, investigators observed via pole camera a car similar in appearance to the
 27 one IBARRA VALLE was seen driving during CS1's controlled purchase, leave 19065 21st Avenue Northeast, Lake
 28 Forest Park, Washington. The location information prior to the suspected IBARRA VALLE vehicle leaving the
 residence varied between a few hundred meters and over a thousand meters. Thus, law enforcement believes this is
 an example of the inaccuracy of the location information when TT4 is at IBARRA VALLE's residence.

²² Investigators are unsure why location data was sent twice around this time as it appears to be an anomaly.

1 91. On April 21, 2020, between approximately 5:20 and 6:20 p.m.,
2 investigators received location information from T-Mobile for **TT5** that, when searched
3 via Google Maps, indicated **TT5** was within a quarter mile of the intersection of
4 Ballinger Way (aka State Highway 104) and 15th Avenue Northeast, Lake Forest Park,
5 Washington. As noted above, the intersection is less than a mile from IBARRA
6 VALLE's residence. Around the same time, location information for **TT4** provided by
7 T-Mobile indicated that IBARRA VALLE was in the area of his residence. While the
8 location information data does not show the phones were right next to one another, it
9 does show they were both within a mile of each other. Based on training and experience,
10 law enforcement believes that it is possible that IBARRA VALLE and GARNICA
11 MELGOZA met at some point during the time when the phones were close to one
12 another.

13 92. On May 28, 2020, between approximately 6:00 p.m., and 10:00 p.m.,
14 investigators received location information from T-Mobile for **TT4** and **TT5**, indicating
15 that the phones were again within one mile of each other for approximately four hours.
16 Earlier in the evening, after 6:00 p.m., the phones were on the West side of Interstate 5,
17 along State Highway 104. Later that evening, before 10:00p.m., the phones were both on
18 the East side of Interstate 5, along Ballinger Way (aka State Highway 104). Based on
19 training and experience, law enforcement believes that it is possible that IBARRA
20 VALLE and GARNICA MELGOZA met at some point during the time when the phones
21 were close to one another.

22 93. On June 1, 2020, at approximately 8:50 a.m., investigator received location
23 information from T-Mobile for **TT5** that, when searched via Google Maps, indicated
24 **TT5** was within a quarter mile of the intersection at Ballinger Way and 15th Avenue
25 Northeast, Lake Forest Park, Washington. As noted elsewhere, this intersection is less
26 than a mile away from IBARA VALLE's residence. At approximately the same time,
27 location information provided by T-Mobile for **TT4** indicated **TT4** was in the area of
28 IBARRA VALLE's residence. Based on training and experience, law enforcement

1 believes that it is possible that IBARRA VALLE and GARNICA MELGOZA met at
2 some point during the time when the phones were close to one another.

3 94. As described above, T-Mobile usually only provides location information
4 approximately every 15 minutes. Based on training and experience, law enforcement
5 knows that it is possible that Jesus GARNICA MELGOZA and IBARRA VALLE met,
6 and parted ways, between one of the approximate 15 minute intervals in which location
7 information was not provided. Further, given the sometimes less precise location
8 information provided by T-Mobile, it is also possible the that when TT4 and TT5 are in a
9 somewhat similar location, that their users are actually meeting even though the location
10 information does not show the phones are right next to one another. At this time,
11 investigators are not aware of any legitimate reason why GARNICA MELGOZA would
12 be in the areas near IBARRA VALLE's residence.

13 95. A review of toll and pen register/trap and trace data shows that TT4 and
14 TT5 were in contact approximately fifteen times on April 17, and approximately twice on
15 April 21, 2020, which are the first two occasions the phones were in close proximity to
16 one another. However, TT4 and TT5 were not in contact on May 28, or June 1, 2020,
17 the other two occasions the phones were in close proximity to one another. Of note is
18 that TT4 and TT5 were in contact approximately five times on May 27, 2020, and
19 approximately 32 times on May 31, 2020. May 27 and May 31, 2020, are one day prior to
20 the third and fourth occasions that TT4 and TT5 were in close proximity to one another,
21 respectively. Based on training and experience, investigators suspect that when TT4 and
22 TT5 were in close proximity to one another that it is possible IBARRA VALLE and
23 Jesus GARNICA MELGOZA met with one another. While the phones were in contact
24 on the first two days of the possible meetings, possibly communicating about the meeting
25 location, the phones were not in contact the second two occasions. However, as outlined
26 above, TT4 and TT5 were in contact the days prior to the third and fourth potential
27 meetings, and law enforcement suspect they could have arranged the possible third and
28 fourth meetings a day in advance.

1 96. The investigation shows that IBARRA VALLE is a likely drug dealer, that
 2 Jesus GARNICA MELOGZA in in frequent contact with and possibly meeting with
 3 IBARRA VALLE, and that Jesus GARNICA MELGOZA is in frequent contact with
 4 others who have past criminal convictions for controlled substance violations. Based on
 5 this information, training, and experience, investigators suspect that Jesus GARNICA
 6 MELGOZA is involved in drug trafficking and uses **TT5** to further his possible drug
 7 trafficking activities.

8 **8. Toll analysis of TT4 and TT6**

9 97. A review of **TT4**'s toll records shows that between April 3, 2020, and May
 10 26, 2020, **TT4** and **TT6** were in contact approximately 120 times; **TT6** is **TT4**'s 17th
 11 most frequent caller. As detailed above, investigators believe PAISA and IBARRA
 12 VALLE are communicating using **TT6** and **TT4** respectively, to further their drug
 13 trafficking activities. Specifically law enforcement suspect this occurred when UC1 was
 14 arranging and attempting to purchase drugs from IBARRA VALLE and then later,
 15 PAISA, on April 13 and April 16, 2020.

16 98. Based on the facts detailed in this affidavit, I believe that **TT4**, **TT5**, and
 17 **TT6** are being used in furtherance of drug trafficking activities.

18 **IV. KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

19 99. Based on my training, experience, and conversations with other
 20 experienced narcotics investigators, I have gained experience in the techniques and
 21 methods used by drug traffickers to distribute controlled substances, to include their use
 22 of cellular phones and other electronic communication devices to facilitate their
 23 trafficking activity. I know drug traffickers use cellular phones to communicate with
 24 suppliers, re-distributors, and customers. These communications via cellular phone often
 25 include discussing details around drug deals such as time and place of drug transactions,
 26 types of drugs, amounts of drugs, methods of payment for drugs, and quality of drugs
 27 sold or bought, amongst other things. I know that it is common for drug traffickers to use
 28 multiple phones as well as change phone numbers regularly. They use different

1 telephones to help compartmentalize their drug trafficking activities. This might entail
2 using specific phones for their personal life and other phones for drug activity. Or it
3 might include using different phones for different individuals or aspects of their business,
4 such as using certain phones to contact suppliers and other phones to contact
5 redistributors. This compartmentalizing is especially common for individuals in
6 leadership positions. Drug traffickers often try to keep the various components and
7 organization members separate to protect parts of the organization from detection by law
8 enforcement. For example, if one individual or arm of a drug trafficking organization
9 (DTO) is arrested or seeks to assist law enforcement, that person could do less damage to
10 the organization if the leadership limits what he or she knows about other parts of the
11 DTO. Drug traffickers also use multiple cell phones to frustrate law enforcement
12 interception and monitoring. Where there are multiple cell phones, law enforcement may
13 learn of one part of the organization's activities by intercepting one phone, but they
14 would not receive information as to the overall activities of the DTO. Thus, the use of
15 multiple cell phones helps the survival of the overall organization.

16 100. Based on my training and experience, I know each cellular device has one
17 or more unique identifiers embedded inside it. Depending on the cellular network and
18 the device, the embedded unique identifiers for a cellular device could take several
19 different forms, including an Electronic Serial Number ("ESN"), a Mobile Electronic
20 Identity Number ("MEIN"), a Mobile Identification Number ("MIN"), a Subscriber
21 Identity Module ("SIM"), a Mobile Subscriber Integrated Services Digital Network
22 Number ("MSISDN"), an International Mobile Subscriber Identifier ("IMSI"), or an
23 International Mobile Equipment Identity ("IMEI"). The unique identifiers -- as
24 transmitted from a cellular device to a cellular antenna or tower -- can be recorded by
25 pen-traps and indicate the identity of the cellular device making the communication
26 without revealing the communication's content.

27 101. Based on my training and experience, I know that when a cell phone
28 connects to a cellular antenna or tower, it reveals its embedded unique identifiers to the

1 cellular antenna or tower, and the cellular antenna or tower records those identifiers as a
2 matter of course. The unique identifiers -- as transmitted from a cell phone to a cellular
3 antenna or tower -- are like the telephone number of an incoming call. They can be
4 recorded by pen-trap devices and indicate the identity of the cell phone device making the
5 communication without revealing the communication's content. In addition, a list of
6 incoming and outgoing telephone numbers is generated when a cell phone is used to
7 make or receive calls, or to send or receive text messages (which may include
8 photographs, videos, and other data). These telephone numbers can be recorded by pen-
9 trap devices and then used to identify the parties to a communication without revealing
10 the communication's contents.

11 102. Based my training and experience, I know that a cell phone can also be
12 used to exchange text messages with email accounts. The email addresses associated
13 with those text messages can be recorded by pen-trap devices and then used to identify
14 parties to a communication without revealing the communication's contents.

15 103. Based on my training and experience, I know that cellular phones can
16 connect to the internet via a cellular network. When connecting through a cellular
17 network, internet communications sent and received by the cellular phone each contain
18 the same unique identifier that identifies cellular voice communications, such as an ESN,
19 MEIN, MIN, SIM, IMSI, MSISDN, or IMEI. Internet communications from a cellular
20 phone also contain the IP address associated with that cellular phone at the time of the
21 communication. Each of these unique identifiers can be used to identify parties to a
22 communication without revealing the communication's contents.

23 104. In my training and experience, I have learned that T-Mobile is a company
24 that provides cellular telephone access to the general public. I also know that certain
25 providers of cellular telephone service have technical capabilities that allow them to
26 collect and generate information about the locations of the cellular telephones to which
27 they provide service, including E-911 Phase II data (also known as GPS data or latitude-
28 longitude data) and cell-site data (also known as "tower/face information" or cell

1 tower/sector records). E-911 Phase II data provides relatively precise location
2 information about the cellular telephone itself, either via GPS tracking technology built
3 into the phone or by triangulating on the device's signal using data from several of the
4 provider's cell towers. Cell-site data identifies the cell towers (i.e., antenna towers
5 covering specific geographic areas) that received a radio signal from the cellular
6 telephone and, in some cases, the "sector" (i.e., faces of the towers) to which the
7 telephone connected. These towers are often a half-mile or more apart, even in urban
8 areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to
9 a wireless device does not necessarily serve every call made to or from that device.

10 Accordingly, cell-site data is typically less precise than E-911 Phase II data.

11 105. Based on my training and experience, I know that T-Mobile can collect E-
12 911 Phase II data about the location of the Target Cell Phone, including by initiating a
13 signal to determine the location of the Target Cell Phone on T-Mobile's network or with
14 such other reference points as may be reasonably available.

15 106. When using a cellular connection to receive or transmit data, a cellular
16 phone typically utilizes a cell tower to make telephone calls, send or receive text
17 messages, send or receive emails, surf the internet, carry out application initiated data
18 transfers, among other things.

19 107. Based on my training and experience, I know that T-Mobile can collect
20 cell-site data about the Target Cell Phone. Based on my training and experience, I know
21 that for each communication (including data connections) a cellular device makes, its
22 wireless service provider can typically determine: (1) the date and time of the
23 communication; (2) the telephone numbers involved, if any; (3) the cell tower to which
24 the customer connected at the beginning of the communication; (4) the cell tower to
25 which the customer connected at the end of the communication; and (5) the duration of
26 the communication. I also know that wireless providers such as T-Mobile typically
27 collect and retain cell-site data pertaining to cellular devices to which they provide
28

1 service in their normal course of business in order to use this information for various
2 business-related purposes.

3 108. Different service providers use different systems, applications, and reports
4 to collect or analyze cell site data. These systems, applications, and reports are referred
5 to by a variety of names including, but not limited to real-time tool or "RTT" (Verizon),
6 Periodic Location Updates or "PLU" (Verizon), per call measurement data or "PCMD"
7 (Sprint), Network Event Location System or "NELOS" (AT&T), EVDO, ALULTE,
8 Timing Advance, and TruCall. RTT data, for example, estimates the approximate
9 distance of the cellular device from a cellular tower based upon the speed with which
10 signals travel between the device and the tower. This information can be used to estimate
11 an approximate location range that is more precise than typical cell-site data.

12 109. Based on my training and experience, I know that wireless providers such
13 as T-Mobile and Verizon typically collect and retain information about their subscribers
14 in their normal course of business. This information can include basic personal
15 information about the subscriber, such as name and address, and the method(s) of
16 payment (such as credit card account number) provided by the subscriber to pay for
17 wireless communication service. I also know that wireless providers such as T-Mobile
18 and Verizon typically collect and retain information about their subscribers' use of the
19 wireless service, such as records about calls or other communications sent or received by
20 a particular device and other transactional records, in their normal course of business. In
21 my training and experience, this information may constitute evidence of the crimes under
22 investigation because the information can be used to identify the Target Cell Phone's user
23 or users and may assist in the identification of co-conspirators and/or victims.

24 110. Modern cell phones allow users to switch their telephone numbers, use
25 multiple telephone numbers on a single device, and transfer their telephone number to a
26 different cell phone. These changes can be made with the assistance of the wireless
27 provider or by taking actions such as changing the "SIM card" (short for "subscriber
28 identity module card") of a cellphone. To provide for any such changes made to the

1 Target Cell Phone, Attachment A specifies that the property to be searched includes:
 2 (i) any instrument to which the listed target telephone number was assigned within the
 3 last 30 days, and that now has been assigned a changed telephone number, (ii) any
 4 changed telephone number assigned to an instrument now bearing the same unique
 5 identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number
 6 listed above, or that was bearing the same unique identifying number as the telephone
 7 number listed above, at any point within the last 30 days, (iii) any changed unique
 8 identifying number subsequently assigned to the same telephone number, or (iv) any
 9 additional changed telephone number and/or unique identifying number, whether the
 10 changes occur consecutively or simultaneously, listed to the same subscriber and wireless
 11 telephone account number as the telephone numbers listed above, within the period of
 12 disclosure authorized by this warrant.

13 V. AUTHORIZATION REQUEST FOR TT4, TT5, AND TT6

14 111. Based on the fact set forth in this affidavit, there is probable cause to
 15 conclude that violations of 21 U.S.C §841 and §846 (distribution of controlled substances
 16 and conspiracy to distribute controlled substances) have been committed, are being
 17 committed, and will be committed by Jose Luis IBARRA VALLE, Jesus GARNICA
 18 MELGOZA, PAISA, and others who are known and unknown. The requested
 19 information, including prospective location information, for **TARGET TELEPHONE 4**,
 20 **TARGET TELEPHONE 5**, and **TARGET TELEPHONE 6**, will help law enforcement
 21 monitor the users of these Target Telephones, follow their movements when they are at
 22 locations that are otherwise hard for law enforcement to observe, and identify other
 23 coconspirators, sources of supply, storage locations, and other people and places of
 24 evidentiary value. There is probable cause to believe that the use of the investigative
 25 technique described by the warrant will result in officers learning that identifying
 26 information.

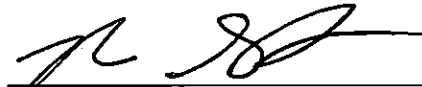
27 112. Based on the foregoing, I request that the Court issue the proposed search
 28 warrant and pen-trap order for the Target Telephones, i.e., **TARGET TELEPHONE 4**,

1 **TARGET TELEPHONE 5**, and **TARGET TELEPHONE 6**, pursuant to Federal Rule
2 of Criminal Procedure 41, 18 U.S.C. § 2703(c), and 18 U.S.C. § 3123.


3 113. I further request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of
4 Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to
5 delay notice to the subscriber or user of the Target Cell Phone until 90 days after the
6 collection authorized by the warrant has been completed. There is reasonable cause to
7 believe that providing immediate notification of the warrant may have an adverse result,
8 as defined in 18 U.S.C. § 2705. Providing immediate notice to the subscriber or user of
9 the Target Cell Phone would seriously jeopardize the ongoing investigation, as such a
10 disclosure would give that person an opportunity to destroy evidence, change patterns of
11 behavior, notify confederates, and flee from prosecution. *See* 18 U.S.C. § 3103a(b)(1).
12 As further specified in Attachment B, which is incorporated into the warrant, the
13 proposed search warrant does not authorize the seizure of any tangible property. *See* 18
14 U.S.C. § 3103a(b)(2). Moreover, to the extent that the warrant authorizes the seizure of
15 any wire or electronic communication (as defined in 18 U.S.C. § 2510) or any stored wire
16 or electronic information, there is reasonable necessity for the seizure for the reasons set
17 forth above. *See* 18 U.S.C. § 3103a(b)(2).

18 114. I further request that the Court direct T-Mobile to disclose to the
19 government any information described in Attachment B that is within the possession,
20 custody, or control of T-Mobile. I also request that the Court direct T-Mobile to furnish
21 the government all information, facilities, and technical assistance necessary to
22 accomplish the collection of the information described in Attachment B unobtrusively
23 and with a minimum of interference with T-Mobile's services, including by initiating a
24 signal to determine the location of the Target Telephones on T-Mobile's network or with
25 such other reference points as may be reasonably available, and at such intervals and
26 times directed by the government. The agency shall reasonably compensate T-Mobile for
27 reasonable expenses incurred in furnishing such facilities or assistance.

1 115. Pursuant to 18 U.S.C. § 2703(g), the government will execute this warrant
2 by serving the warrant on T-Mobile. Because the warrant will be served on T-Mobile,
3 who will then compile the requested records and data, reasonable cause exists to permit
4 the execution of the requested warrant at any time in the day or night. I therefore request
5 that the Court authorize execution of the warrant at any time of day or night, owing to the
6 potential need to locate the Target Cell Phone outside of daytime hours.

7
8 
9 Ryan Smith, Affiant
10 Special Agent
11 Drug Enforcement Administration

12 The above-named agent provided a sworn statement to the truth of the foregoing
13 affidavit by telephone on 11th day of June, 2020.

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16 PAULA McCANDLIS
17 United States Magistrate Judge
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ATTACHMENT A

Property to Be Searched and Subscriber/Subject Information

1. Records and information associated with the cellular phone assigned call number (206) 880-4341, with listed subscriber "Jose Luis VALLE IBARRA" with an address of "19065 21st Ave NE, Lake Forest Park, Washington, 98155-2401," hereinafter referred to as **Target Telephone 4**, whose service provider is T-Mobile, a company headquartered at 4 Sylvan Way, Parsippany, New Jersey 07054. Investigators believe that **Target Telephone 4** is being used by Jose Luis IBARRA VALLE, who is a subject of the criminal investigation.

2. Records and information associated with the cellular phone assigned call number (425) 328-5534, with listed subscriber "Jesus Granica" with an address of "2118 168th Street SE, Bothell, Washington, 98012-6056," hereinafter referred to as **Target Telephone 5**, whose service provider is T-Mobile, a company headquartered at 4 Sylvan Way, Parsippany, New Jersey 07054. Investigators believe that **Target Telephone 5** is being used by Jesus GARNICA MELGOZA, who is a subject of the criminal investigation.

3. Records and information associated with the cellular phone assigned call number (425) 626-8865, with no listed subscriber or address, hereinafter referred to as **Target Telephone 6**, whose service provider is T-Mobile, a company headquartered at 4 Sylvan Way, Parsippany, New Jersey 07054. Investigators believe that **Target Telephone 6** is being used by an individual using the name "Paiza," who is a subject of the criminal investigation.

4. The property to be searched includes: (i) any instrument to which the listed target telephone number was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number assigned to an instrument now bearing the same unique identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or that was bearing the same unique identifying number as the telephone number listed above, at any point within the

1 last 30 days, (iii) any changed unique identifying number subsequently assigned to the
2 same telephone number, or (iv) any additional changed telephone number and/or unique
3 identifying number, whether the changes occur consecutively or simultaneously, listed to
4 the same subscriber and wireless telephone account number as the telephone numbers
5 listed above, within the period of disclosure authorized by this warrant.
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ATTACHMENT B

Particular Things to be Seized

This warrant is issued pursuant to Rule 41 of the Federal Rules of Criminal Procedure, the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701-2713, and the Pen Register Act, 18 U.S.C. §§ 3121-3127. As such, this warrant authorizes the collection of subscriber records, pen-trap data, and cell site data information regarding the Target Telephones. **This warrant does not authorize the disclosure or seizure of any tangible property or the content of any wire or electronic communication, as defined in 18 U.S.C. § 2510(8).** Accordingly, the Court finds reasonable necessity for the seizure of the data and records identified below. *See* 18 U.S.C. § 3103a(b)(2).

I. Section I: Information to be Disclosed by T-Mobile

1. **Subscriber/Account Information.** The following non-content information about the customers or subscribers associated with the Account listed in Attachment A:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records for 30 days;
- d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions for 30 days;
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifiers ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital

1 Network Numbers ("MSISDN"), International Mobile Subscriber Identity Identifiers
2 ("IMSI"), or International Mobile Equipment Identities ("IMEI");

3 g. Other subscriber numbers or identities (including the registration
4 Internet Protocol ("IP") address); and

5 h. Means and source of payment for such service (including any credit
6 card or bank account number) and billing records.

7 **2. Pen Register/ Trap and Trace Data and Associated Subscriber Records**
8 **to Be Provided for a Period of 45 Days.**

9 a. T-Mobile shall install and monitor pen-trap devices to record,
10 decode, and/or capture dialing, routing, addressing, and signaling information associated
11 with each communication to or from the Target Telephones including the date, time, and
12 duration of the communication, and the following, without geographic limit and without
13 notice to the subscriber:

- 14 (i) IP addresses associated with the cell phone device or devices used to send or
15 receive electronic communications;
16 (ii) Any unique identifiers associated with the cell phone device or devices used
17 to make and receive calls with the cell phone number described in
18 Attachment A, or to send or receive other electronic communications,
19 including the ESN, MEIN, IMSI, IMEI, SIM, MSISDN, or MIN;
20 (iii) IP addresses of any websites or other servers to which the cell phone device
21 or devices connected; and
22 (iv) Source and destination telephone numbers and email addresses.

23 b. On a 24-hour-a-day basis, for the duration of the authorized pen-trap
24 devices, T-Mobile shall provide the following records for those subscribers whose
25 identifiers are obtained pursuant to the use of the pen-trap devices: published or non-
26 published subscriber names and addresses, including billing addresses.
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1 **3. Historical Cell Site Location Information.**

2 a. All records and other information (**not** including the contents of
3 **communications**) relating to wire and electronic communications sent or received by the
4 Accounts from April 13, 2020, to June 11, 2020, including:

5 i. the date and time of the communication, the method of the
6 communication, and the source and destination of the communication (such as the source
7 and destination telephone numbers (call detail records), email addresses, and IP
8 addresses); and

9 ii. historical cell site information regarding the cell tower and
10 antenna face (also known as “sectors”) through which the communications were sent and
11 received. This information is to be provided irrespective of the application, name, or
12 report utilized by T-Mobile. Accordingly, this information includes the following data
13 sets to the extent that they are collected by T-Mobile: RTT, PLU, PCMD, NELOS,
14 EVDO, TruCall, ALULTE, and Timing Advance.

15 b. The physical address and coverage maps of cell towers used by the
16 Target Telephones.

17 **1. Prospective Cell Site Location Information.**

18 a. All information about the location of the Target Telephones
19 described in Attachment A for **a period of 45**, during all times of day and night. This
20 information includes: precise location information, as well as all data about which “cell
21 towers” (i.e., antenna towers covering specific geographic areas) and “sectors” (i.e., faces
22 of the towers) received a radio signal from the cellular telephones or accounts described
23 in Attachment A.

24 b. The physical address and coverage maps of cell towers used by the
25 Target Telephones.
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27 **2. Prospective E-911/GPS and Cell Site Triangulation Information.**

28 a. All information about the location of the Target Telephones

described in Attachment A for a period of 45 days, during all times of day and night. This information includes: all available E-911 Phase II data, GPS data, latitude-longitude data, and other precise location information, as well as all data about which “cell towers” (i.e., antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received a radio signal from the cellular telephones or accounts described in Attachment A.

b. The physical address and coverage maps of cell towers used by the Target Telephones.

To the extent that the location information described in the previous paragraphs (hereinafter, “Location Information”) is within the possession, custody, or control of T-Mobile, T-Mobile is required to disclose the Location Information to the government pursuant to this warrant. In addition, pursuant to 18 U.S.C. §§ 3123(b)(2) and 3124(a)-(b), T-Mobile must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with T-Mobile’s services. The government shall compensate T-Mobile for reasonable expenses incurred in furnishing such facilities or assistance.

II. Section II: Information to Be Seized by the Government

1. All information described above in Section I that constitutes evidence of violations of Title 21, United States Code, Sections 841 and 846, involving Jose Luis IBARRA VALLE, Jesus GARNICA MELGOZA, and/or Paisa.

2. All non-content subscriber/account information provided pursuant to 18 U.S.C. § 2703(c).

3. All non-content dialing, routing, addressing, and signaling information provided pursuant to 18 U.S.C. §§ 3121-3127.

4. Location Information regarding the Target Cell Phone.

1 Law enforcement personnel (who may include, in addition to law enforcement
2 officers and agents, attorneys for the government, attorney support staff, agency
3 personnel assisting the government in this investigation, and outside technical experts
4 under government control) are authorized to review the records produced by the T-
5 Mobile in order to locate the things particularly described in this Warrant.
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